

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: EURNELL HOYLE**

**CHAPTER 13**

**DEBTOR**

**CASE NO. 21-10176 JDW**

**MOTION TO SUSPEND CHAPTER 13 PLAN PAYMENTS**

COMES NOW, Eurnell Hoyle, Debtor, by and through his attorney of record, and files this Motion to Suspend his Chapter 13 Plan payments for 2 (two) months, commencing with the November, 2021 payment, and would show unto the Court as follows:

1. That Debtor filed a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code on January 27, 2021. He is in a 60-month plan, which was confirmed on June 21, 2021.

2. The Debtor's income has significantly decreased. The Debtor cares for elderly patients and several have refused care due to concerns with the pandemic. The Debtor has been actively looking for other employment as well. Therefore, the Debtor is in need of a 2 (two) month suspension of his Plan payments, specifically for the months of November and December, 2021.

3. Debtor requests that any mortgage payments that are currently delinquent and that may become delinquent be placed in the arrearage and paid over the life of the Plan.

4. Debtor would further request that any current delinquency be amortized of the remaining life of the Plan.

5. Debtor requests any money received by the Trustee during the suspension be returned to her.

6. Debtor would submit he will make the January, 2022, plan payment within 30-days of the end of the suspension, or seek further relief from the Court.

WHEREFORE, PREMISES CONSIDERED, Debtor moves this Honorable Court to enter an order suspending his Chapter 13 plan payments for the month of November and December, 2021, and for such further and general relief to which the Debtor may be entitled.

Dated: November 4, 2021

RESPECTFULLY SUBMITTED,

/s/Robert H. Lomenick  
KAREN B. SCHNELLER, MSB 6559  
ROBERT H. LOMENICK, MSB 104186  
SCHNELLER & LOMENICK, P.A.  
Post Office Box 417  
Holly Springs, Mississippi 38635  
662-252-3224 - Telephone Number  
662-252-2858 - Facsimile Number  
[karen.schneller@gmail.com](mailto:karen.schneller@gmail.com)  
[robert@northmsbankruptcy.com](mailto:robert@northmsbankruptcy.com)

CERTIFICATE OF SERVICE

I, Robert H. Lomenick, Attorney for Debtor, does hereby certify that I have this day mailed postage prepaid and/or via electronic delivery, a true and correct copy of the above and foregoing Motion to Suspend Payments to:

Ms. Locke D. Barkley, via ECF

Office of the U. S. Trustee, via ECF

\*all creditors on matrix

This the 4th day of November, 2021

/s/Robert H. Lomenick  
ROBERT H. LOMENICK